

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

§
§ No. 4:24-cr-224

v.

§
§
§
§
§
§
§
§

ENRIQUE ROBERTO “HENRY”
CUELLAR and IMELDA RIOS
CUELLAR,

Defendants. §

**GOVERNMENT’S UNOPPOSED MOTION TO DISCLOSE GRAND JURY
MATERIALS**

On May 9, 2024, Defendant Enrique “Henry” Cuellar filed a motion to dismiss the Indictment based on the Speech or Debate Clause of the United States Constitution. *See* ECF No. 87. In his motion, Defendant Cuellar asked the Court to order the government to disclose the transcript of the indictment proceedings before the grand jury, which neither defendant had previously requested. *Id.* at 1, 16. Pursuant to Federal Rule of Criminal Procedure 6(e), the government may not disclose proceedings before the grand jury without authorization. Accordingly, pursuant to Rule 6(e)(3)(E), the government respectfully requests that the Court authorize it to disclose to defense counsel of record the transcripts of witness testimony and associated exhibits related to this matter, subject to the Protective Order, ECF No. 40.

Dated: May 15, 2025

EDWARD P. SULLIVAN
Acting Chief
Public Integrity Section
Criminal Division
U.S. Department of Justice

By: /s/ Celia Choy
Rosaleen O'Gara
Celia Choy
Aaron L. Jennen
Attorneys for the United States

Respectfully submitted,

JENNIFER KENNEDY GELLIE
Chief
Counterintelligence and Export Control Section
National Security Division
U.S. Department of Justice

By: /s/ Garrett Coyle
Garrett Coyle
Attorney for the United States

CERTIFICATE OF CONFERENCE

I certify that on May 14, 2025, I conferred with counsel for defendants Henry Cuellar and Imelda Cuellar regarding this motion, and they advised that neither defendant objects to this motion.

/s/ Celia Choy
Celia Choy

CERTIFICATE OF SERVICE

I certify that I filed this motion via the CM/ECF system on May 15, 2025, which caused the motion to be electronically served on all counsel of record.

/s/ Celia Choy
Celia Choy